

Stephen Andrews (State Bar No. 205961)  
**WILLIAMS & CONNOLLY LLP**  
725 12th Street, N.W.  
Washington, D.C. 20005  
Tel: (202) 434-5000  
Fax: (202) 434-5029  
sandrews@wc.com

*Attorney for Defendant Jazz Pharmaceuticals plc*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

CITY OF PROVIDENCE, RHODE  
ISLAND,

Plaintiff,

v.

JAZZ PHARMACEUTICALS PLC,  
ROXANE LABORATORIES, INC.,  
HIKMA LABS INC., HIKMA  
PHARMACEUTICALS PLC, WEST-  
WARD PHARMACEUTICALS CORP.,  
HIKMA PHARMACEUTICALS USA INC.,

Defendants.

Case No. 3:20-cv-04064-LB

**STIPULATION REGARDING DEFENDANT  
JAZZ PHARMACEUTICALS PLC'S  
DEADLINE TO RESPOND TO THE  
COMPLAINT**

Pursuant to Civil Local Rule 6-1(a), plaintiff City of Providence, Rhode Island (“City of Providence”), and defendant Jazz Pharmaceuticals plc (“Jazz plc”), stipulate as follows:

WHEREAS, the Complaint in the above-captioned matter was filed on June 18, 2020 (ECF No. 1),

WHEREAS City of Providence purported to serve Jazz plc with the Complaint on June 24, 2020, but served an agent for Jazz Pharmaceuticals, Inc., and had service rejected by the agent;

WHEREAS if City of Providence properly served Jazz plc with the Complaint on June 24, 2020, Jazz plc’s deadline to answer or otherwise respond to the Complaint would be July 15, 2020;

WHEREAS, Jazz plc has only recently retained undersigned counsel, and counsel for Jazz plc requires time to consider the allegations raised in the Complaint and potentially to meet and confer with counsel for City of Providence regarding various issues;

WHEREAS related cases asserting claims and allegations similar to those asserted here have been filed in this Court and at least one other federal District Court, and extending Jazz plc’s time to respond would facilitate the coordination and early scheduling of this matter with the related cases;

WHEREAS City of Providence agrees that Jazz plc may have a forty-five (45) day extension through and including August 31, 2020, within which to answer or otherwise respond to the Complaint;

WHEREAS, by agreeing to this extension, Jazz plc is not waiving any defense, including any defenses relating to jurisdiction, service, or venue, in this or any other case;

WHEREAS, there have been no other requests for extensions of time;

WHEREAS, the extension will not alter the date of any event or deadline already fixed by Court order; and

WHEREAS, this Stipulation shall be without prejudice to any Defendant’s right to seek, and City of Providence’s right to oppose, an additional extension of time to respond to the Complaint.

NOW THEREFORE, pursuant to Local Rule 6-1(a), City of Providence and Jazz plc through their respective counsel hereby stipulate that the deadline for Jazz plc to answer or otherwise respond to the Complaint is extended to August 31, 2020.

**IT IS SO STIPULATED.**

1  
2 Dated: July 15, 2020

Respectfully submitted,

3  
4 By: /s/ Stephen Andrews  
5 Stephen Andrews (State Bar No. 205961)  
6 **WILLIAMS & CONNOLLY LLP**  
7 725 12th Street, N.W.  
8 Washington, D.C. 20005  
9 Tel: (202) 434-5000  
10 Fax: (202) 434-5029  
11 sandrews@wc.com

12 *Attorneys for Defendant Jazz Pharmaceuticals*  
13 *plc*

14 Dated: July 15, 2020

15  
16 By: /s/ Jeff S. Westerman  
17 Jeff S. Westerman (SBN 94559)  
18 **WESTERMAN LAW CORP.**  
19 16133 Ventura Blvd., Suite 685  
20 Encino, CA 91436  
21 Tel: (310) 698-7450  
22 jwesterman@jswlegal.com

23 Michael M. Buchman  
24 Michelle C. Clerkin  
25 **MOTLEY RICE LLC**  
26 777 Third Avenue, 27th Floor  
27 New York, NY 10017  
28 (212) 577-0050  
mbuchman@motleyrice.com  
mclerkin@motleyrice.com

*Attorneys for Plaintiff The City of  
Providence, Rhode Island, and the  
Proposed Class*

**ATTESTATION**

I, Stephen Andrews, am the ECF User whose ID and password are being used to file this document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

/s/ Stephen Andrews  
Stephen Andrews

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2020, the within documents were filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to the attorneys of record in this case.

/s/ Stephen Andrews

Stephen Andrews